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PUBLIC COMMENT 8400079

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Date: 7/7/04 9:50AM
Subject: Public Comment on FR DOCKET NUMBER 04-7984, Mandatory Guidelines

I'm writing to ask that SAMHSA make changes to its proposed drug testing guidelines because, as written, they discriminate against those of us who suffer from paruresis. An inability to produce a specimen should never be equated with a refusal to test.

SAMHSA needs to do away with the 3 hour 40 ounce rule because it is a barbaric torture to those who suffer from severe forms of paruresis. Instead, SAMHSA must MANDATE the use of tests such as oral fluid, sweat, hair, or blood, for any job applicant or employee who claims to suffer from paruresis, or who simply wishes to provide a specimen other than urine. These changes are essential, because present rules result in massive job discrimination against the many people who have all manner of medical and psychological reasons for not being able to produce urine samples."

Darryl B. Pell